

**THE LAW FIRM OF JEFFREY S. DWECK, P.C.**

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**ELLIOT M. HIRSCH,**

**Plaintiff,**

**Case No.: 21-cv-12246 (FLW)(RLS)**

**-against-**

**ADINA MILES, LAURIE BEDA, NORMA TAWIL,  
HESHY TISCHLER, AMBER ADLER, YESHIVA  
OF FLATBUSH JOEL BRAVERMAN HIGH  
SCHOOL, ELISHEVA YARIMI, NOURITE  
MAIMON, EVE SCABA, SARAH MIZRAHI,  
YAFAH SUTTON, ELIZABETH KAIKEY,  
ISABELLA KHAIMOV, LAUREN DAGMY,  
MIRIAM SABZEHROO, RAQUEL SABZEHROO,  
SARI DANA, SHERRY CHERA HALABI, DALIA  
OZIEL, DEBORAH SHILOACH, EVA SHAMMAH,  
THE EDMOND J. SAFRA SYNAGOGUE INC. AND  
RABBI ELI J. MANSOUR.,**

**Defendants.**

**REPLY DECLARATION IN FURTHER SUPPORT OF DEFENDANT YAFAH  
SUTTON'S MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO TRANSFER THIS  
ACTION TO THE DISCTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK**

Jeffrey S. Dweck, an attorney duly admitted to practice before the Courts of New York and New Jersey, declares under the penalties of perjury:

1. I am with The Law Firm Of Jeffrey S. Dweck, P.C., counsel for the Defendant Yafah Sutton in this action and I make this Declaration in further support of her motion to dismiss the complaint on the basis of *forum non conveniens* and in response to Plaintiff's Opposition.
2. At this juncture, I wish to clarify only two points raised by Plaintiff in his Opposition.
3. First, contrary to the Plaintiff's statement, the affirmative defense of *forum non conveniens* was indeed raised in Ms. Sutton's Answer.

4. Second, while Plaintiff goes to great lengths to paint New Jersey as the situs of his troubles, he fails to plead that Ms. Sutton was ever in New Jersey for the events complained of, that she ever attended a rally or demonstration in New Jersey, that she ever texted or posted anything about him, or that anyone who witnessed her holding a sign in Brooklyn, New York resides in New Jersey. Indeed, she never did and has no business being sued in a New Jersey over the events complained of.

5. As to her at least, this case should be transferred to the Eastern District of New York, if not dismissed altogether for lack of personal jurisdiction.

Dated: April 29, 2022  
New York, New York



Jeffrey Dweck